

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XIAOBING WANG AND LIANGQING LI,

Plaintiffs,

v.

INDIVIDUALS, PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS ON
SCHEDULE “A,”

Defendants.

Case No. 22-cv-2024

District Judge Thomas M. Durkin
Magistrate Judge Sheila M. Finnegan

PLAINTIFFS’ MOTION TO LIFT STAY

NOW COMES Plaintiffs Xiaobing Wang and Liangqing Li (“Plaintiffs”), by their counsel, move this Honorable Court to lift the stay entered on February 17, 2023. In support of this Motion, Plaintiffs state as follows:

1. On February 17, 2023, this Honorable Court stayed this case pending its review of the file.
2. On April 3, 2023, this Honorable Court declined to dismiss the case as a sanction and admonished Plaintiffs.
3. In that same order of April 3, 2023, the Court set the telephonic status hearing for June 1, 2023, but did not lift the stay.
4. Prior to the stay, Plaintiffs and Defendant No. 281, Joybuy and Defendant No. 282, Joybuy Express (collectively, “the Joybuy Marketplace”) had been in discussions regarding their position as an internet marketplace platform rather than individual sellers.

5. Since the entry of the April 3, 2023, Order, counsels for the Joybuy Marketplace contacted Plaintiffs' counsels about being dismissed and/or substituted for the proper sellers of the infringing products within the Joybuy Marketplace internet marketplace platform.

6. Any such dismissal or substitution is not the result of any settlement between these parties.

7. Plaintiffs are requesting that this Honorable Court lift the stay placed on the case either in its entirety or insofar as to allow the Joybuy Marketplace to be dismissed and/or substituted.

WHEREFORE Plaintiffs Xiaobing Wang and Liangqing Li, by their counsels, Barney & Karamanis, LLP, move this Honorable Court to lift the stay entered on February 17, 2023, and/or allow the stay to be lifted to dismiss the Defendant No. 281, Joybuy and Defendant No. 282, Joybuy Express as requested.

Respectfully submitted,

/s/ Kenneth A. Nazarian
James A. Karamanis
Kenneth A. Nazarian
Barney & Karamanis, LLP
Two Prudential Plaza
180 N. Stetson, Ste 3050
Chicago, IL 60601
Tel.: 312/553-5300
Attorney No. 6309765
Ken@bkchicagolaw.com

ATTORNEY FOR PLAINTIFFS
Xiaobing Wang and Liangqing Li

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2023, a true and correct copy of the foregoing document was filed electronically through the Court's CM/ECF system with notice of case activity automatically generated and sent electronically to counsel of record.

/s/Kenneth A. Nazarian

Kenneth A. Nazarian
Barney & Karamanis, LLP
Two Prudential Plaza
180 N. Stetson, Ste 3050
Chicago, IL 60601
Tel.: 312/553-5300
Attorney No. 6309765
Ken@bkchicagolaw.com